

VENABLE LLP
2049 CENTURY PARK EAST, SUITE 2300
LOS ANGELES, CA 90067
310.229.9900

VENABLE LLP
Desirée F. Moore (admitted *Pro Hac Vice*)
dmoore@venable.com
227 West Monroe Street, Suite 1900
Chicago, Illinois 60606
Telephone: 312.820.3400
Facsimile: 312.820.3401

VENABLE LLP
Joshua M. Rosenberg (SBN 274473)
jmrosenberg@venable.com
Rachel C. Richards (SBN 329444)
rcrichards@venable.com
Kaidyn P. McClure (SBN 352627)
kpmcclure@venable.com
2049 Century Park East, Suite 2300
Los Angeles, CA 90067
Telephone: 310.229.9900
Facsimile: 310.229.9901

*Attorneys for Defendants Terius Gesteelde-Diamant
and Contra Paris, LLC*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CHANAAZ MANGROE,

Plaintiff,

v.

TERIUS GESTEELDE-DIAMANT
p/k/a “THE-DREAM”; CONTRA
PARIS, LLC; and SONY MUSIC
ENTERTAINMENT

Defendants.

Case No. 2:24-cv-04639-SPG-PVC

Hon. Sherilyn Peace Garnett
Courtroom 5C

**DEFENDANTS TERIUS
GESTEELDE-DIAMANT P/K/A
“THE-DREAM” AND CONTRA
PARIS, LLC’S ANSWER TO
PLAINTIFF CHANAAZ
MANGROE’S FIRST AMENDED
COMPLAINT**

Action Filed: June 4, 2024
Trial Date: None

Defendants Terius Gesteelde-Diamant p/k/a “The-Dream” and Contra Paris, LLC (collectively “Defendants”) hereby submit their Answer and Affirmative Defenses to Plaintiff Chanaaz Mangroe’s (“Plaintiff”) First Amended Complaint (“FAC”) (Dkt. 32) as follows:

PRELIMINARY STATEMENT

1. Defendants admit that The-Dream is an award-winning singer, songwriter, and producer. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1 of the FAC, and therefore deny the same.

2. The contents of the *Billboard* Magazine article alleged in Paragraph 2 Footnote 1 speak for themselves, and to the extent that the allegations in Paragraph 2 regarding the alleged article are inconsistent with that alleged article, they are denied. Defendants deny the remaining allegations in Paragraph 2 of the FAC.

3. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 3 of the FAC, and therefore deny the same.

4. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 4 of the FAC, and therefore deny the same.

5. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 5 of the FAC, and therefore deny the same.

6. Deny.

7. The contents of the *New Yorker* Magazine article alleged in Paragraph 7 Footnote 2 speak for themselves, and to the extent that the allegations in Paragraph 7 regarding the alleged article are inconsistent with that alleged article, they are denied. Defendants deny the remaining allegations in Paragraph 7 of the FAC.

1 8. Deny.

2 9. Deny.

3 10. Deny.

4 11. Deny.

5 12. Defendants are without knowledge or information sufficient to form a
6 belief as to the truth of the allegations in Paragraph 12 of the FAC, and therefore
7 deny the same.

8 13. Defendants are without knowledge or information sufficient to form a
9 belief as to the truth of the allegations in Paragraph 13 of the FAC, and therefore
10 deny the same.

11 **JURISDICTION AND VENUE**

12 14. The allegations contained in Paragraph 14 of the FAC are conclusions
13 of law to which no response is required.

14 15. The allegations contained in Paragraph 15 of the FAC are conclusions
15 of law to which no response is required.

16 **THE PARTIES**

17 16. Defendants are without knowledge or information sufficient to form a
18 belief as to the truth of the allegations in Paragraph 16 of the FAC, and therefore
19 deny the same.

20 17. Admit.

21 18. Defendants admit that Contra Paris, LLC is a limited liability
22 company incorporated in Delaware and is owned and operated by The-Dream
23 during the relevant time period. Defendants deny the remaining allegations in
24 Paragraph 18 of the FAC.

25 19. Defendants are without knowledge or information sufficient to form a
26 belief as to the truth of the allegations in Paragraph 19 of the FAC, and therefore
27 deny the same.

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FACTUAL ALLEGATIONS

20. Admit.

21. Admit.

22. Admit.

23. Admit.

24. Admit.

25. Deny.

26. The contents of the *Hypebeast* Magazine article alleged in Paragraph 26 Footnote 3 speak for themselves, and to the extent that the allegations in Paragraph 26 are inconsistent with that alleged article, they are denied.

27. The alleged website speaks for itself, and to the extent that the allegations in Paragraph 27 are inconsistent with that alleged website, they are denied. Defendants deny the remaining allegations in Paragraph 27 of the FAC.

28. The contents of the articles alleged in Paragraph 28 Footnote 4 speak for themselves, and to the extent that the allegations in Paragraph 28 regarding the alleged articles are inconsistent with those alleged articles, they are denied. Defendants deny the remaining allegations in Paragraph 28 of the FAC.

29. Deny.

30. Admit.

31. The contents of the *Essence* Magazine article alleged in Paragraph 31 Footnote 6 speak for themselves, and to the extent that the allegations in Paragraph 31 are inconsistent with that alleged article, they are denied. Defendants deny the remaining allegations in Paragraph 31 of the FAC.

32. The contents of the alleged *Essence* Magazine interview speak for themselves, and to the extent that the allegations in Paragraph 32 regarding the alleged article are inconsistent with the alleged article, they are denied. Defendants deny the remaining allegations in Paragraph 32 of the FAC.

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1 33. The contents of the *BET* article alleged in Paragraph 33 Footnote 7
2 speak for themselves, and to the extent that the allegations in Paragraph 33
3 regarding the alleged article are inconsistent with the alleged article, they are
4 denied. Defendants deny the remaining allegations in Paragraph 33 of the FAC.

5 34. Deny.

6 35. The contents of the alleged criminal complaint speak for themselves,
7 and to the extent that the allegations in Paragraph 35 regarding the alleged criminal
8 complaint are inconsistent with that alleged criminal complaint, they are denied.
9 The contents of the alleged TMZ publication speak for themselves, and to the
10 extent that the allegations in Paragraph 35 regarding the alleged publication are
11 inconsistent with that alleged publication, they are denied. Defendants deny the
12 remaining allegations in Paragraph 35 of the FAC.

13 36. The contents of the alleged public announcement speak for
14 themselves, and to the extent that the allegations in Paragraph 36 are inconsistent
15 with that alleged public announcement, they are denied. Defendants deny the
16 remaining allegations in Paragraph 36 of the FAC.

17 37. The contents of the *Rolling Stone* Magazine article alleged in
18 Paragraph 37 Footnote 8 speak for themselves, and to the extent that the
19 allegations in Paragraph 37 are inconsistent with the alleged article, they are
20 denied.

21 38. Deny.

22 39. Defendants are without knowledge or information sufficient to form a
23 belief as to the truth of the allegations in Paragraph 39 of the FAC, and therefore
24 deny the same.

25 40. Defendants are without knowledge or information sufficient to form a
26 belief as to the truth of the allegations in Paragraph 40 of the FAC, and therefore
27 deny the same.

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1 41. Defendants are without knowledge or information sufficient to form a
2 belief as to the truth of the allegations in Paragraph 41 of the FAC, and therefore
3 deny the same.

4 42. Defendants are without knowledge or information sufficient to form a
5 belief as to the truth of the allegations in Paragraph 42 of the FAC, and therefore
6 deny the same.

7 43. Defendants are without knowledge or information sufficient to form a
8 belief as to the truth of the allegations in Paragraph 43 of the FAC, and therefore
9 deny the same.

10 44. Defendants are without knowledge or information sufficient to form a
11 belief as to the truth of the remaining allegations in Paragraph 44 of the FAC, and
12 therefore deny the same.

13 45. Defendants are without knowledge or information sufficient to form a
14 belief as to the truth of the allegations in Paragraph 45 of the FAC, and therefore
15 deny the same.

16 46. The contents of the *Billboard* Magazine article alleged in Paragraph
17 46 Footnote 9 speak for themselves, and to the extent that the allegations in
18 Paragraph 46 regarding the alleged article are inconsistent with that alleged article,
19 they are denied. Defendants are without knowledge or information sufficient to
20 form a belief as to the truth of the remaining allegations in Paragraph 46 of the
21 FAC, and therefore deny the same.

22 47. Defendants admit that The-Dream and/or Christopher Stewart
23 produced and/or wrote songs for the identified singers, produced five studio
24 albums, and received several Grammy Award nominations and multiple wins.
25 Defendants are without knowledge or information sufficient to form a belief as to
26 the truth of the remaining allegations in Paragraph 47 of the FAC, and therefore
27 deny the same.

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1 48. Defendants are without knowledge or information sufficient to form a
2 belief as to the truth of the allegations in Paragraph 48 of the FAC, and therefore
3 deny the same.

4 49. Defendants are without knowledge or information sufficient to form a
5 belief as to the truth of the allegations in Paragraph 49 of the FAC, and therefore
6 deny the same.

7 50. Defendants are without knowledge or information sufficient to form a
8 belief as to the truth of the allegations in Paragraph 50 of the FAC, and therefore
9 deny the same.

10 51. Defendants are without knowledge or information sufficient to form a
11 belief as to the truth of the allegations in Paragraph 51 of the FAC, and therefore
12 deny the same.

13 52. Defendants are without knowledge or information sufficient to form a
14 belief as to the truth of the allegations in Paragraph 52 of the FAC, and therefore
15 deny the same.

16 53. Defendants are without knowledge or information sufficient to form a
17 belief as to the truth of the allegations in Paragraph 53 of the FAC, and therefore
18 deny the same.

19 54. Defendants are without knowledge or information sufficient to form a
20 belief as to the truth of the allegations in Paragraph 54 of the FAC, and therefore
21 deny the same.

22 55. Defendants are without knowledge or information sufficient to form a
23 belief as to the truth of the allegations in Paragraph 55 of the FAC, and therefore
24 deny the same.

25 56. Deny.

26 57. Defendants are without knowledge or information sufficient to form a
27 belief as to the truth of the allegations in the first sentence of Paragraph 57 of the
28

1 FAC, and therefore deny the same. Defendants deny the remaining allegations in
2 Paragraph 57 of the FAC.

3 58. Deny.

4 59. Deny.

5 60. Defendants are without knowledge or information sufficient to form a
6 belief as to the truth of the allegations in Paragraph 60 of the FAC, and therefore
7 deny the same.

8 61. Defendants are without knowledge or information sufficient to form a
9 belief as to the truth of the allegations in Paragraph 61 of the FAC, and therefore
10 deny the same.

11 62. Defendants are without knowledge or information sufficient to form a
12 belief as to the truth of the allegations in Paragraph 62 of the FAC, and therefore
13 deny the same.

14 63. Deny.

15 64. Defendants are without knowledge or information sufficient to form a
16 belief as to the truth of the allegations in Paragraph 64 of the FAC, and therefore
17 deny the same.

18 65. Deny.

19 66. Defendants are without knowledge or information sufficient to form a
20 belief as to the truth of the allegations in Paragraph 66 of the FAC, and therefore
21 deny the same.

22 67. Deny.

23 68. Deny.

24 69. Deny.

25 70. Deny.

26 71. The contents of the alleged text message speak for themselves, and to
27 the extent that the allegations in Paragraph 71 are inconsistent with that alleged
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1 text message, they are denied. Defendants deny the remaining allegations in
2 Paragraph 71 of the FAC.

3 72. Deny.

4 73. The contents of the alleged text messages speak for themselves, and to
5 the extent that the allegations in Paragraph 73 are inconsistent with those alleged
6 text messages, they are denied.

7 74. Deny.

8 75. Deny.

9 76. Deny.

10 77. Deny.

11 78. Deny.

12 79. Deny.

13 80. Deny.

14 81. The contents of the alleged text messages speak for themselves, and to
15 the extent that the allegations in Paragraph 81 regarding the alleged text messages
16 are inconsistent with those alleged text messages, they are denied. Defendants
17 deny the remaining allegations in Paragraph 81 of the FAC.

18 82. Defendants are without knowledge or information sufficient to form a
19 belief as to the truth of the allegations in Paragraph 82 of the FAC, and therefore
20 deny the same.

21 83. The contents of the alleged text messages speak for themselves, and to
22 the extent that the allegations in Paragraph 83 regarding the alleged text messages
23 are inconsistent with those alleged text messages, they are denied. Defendants
24 deny the remaining allegations in Paragraph 83 of the FAC.

25 84. Deny.

26 85. The contents of the alleged text messages speak for themselves, and to
27 the extent that the allegations in Paragraph 85 regarding the alleged text messages
28

1 are inconsistent with those alleged text messages, they are denied. Defendants
2 deny the remaining allegations in Paragraph 85 of the FAC.

3 86. Defendants are without knowledge or information sufficient to form a
4 belief as to the truth of the allegations in the first sentence of Paragraph 86 of the
5 FAC, and therefore deny the same. Defendants deny the remaining allegations in
6 Paragraph 86 of the FAC.

7 87. Defendants are without knowledge or information sufficient to form a
8 belief as to the truth of the allegations in Paragraph 87 of the FAC, and therefore
9 deny the same.

10 88. The contents of the alleged text messages speak for themselves, and to
11 the extent that the allegations in Paragraph 88 regarding the alleged text messages
12 are inconsistent with those alleged text messages, they are denied. Defendants are
13 without knowledge or information sufficient to form a belief as to the truth of the
14 remaining allegations in Paragraph 88 of the FAC, and therefore deny the same.

15 89. Defendants are without knowledge or information sufficient to form a
16 belief as to the truth of the allegations in Paragraph 89 of the FAC, and therefore
17 deny the same.

18 90. Deny.

19 91. Deny.

20 92. Deny.

21 93. Deny.

22 94. Deny.

23 95. Deny.

24 96. Deny.

25 97. Deny.

26 98. Deny.

27 99. Deny.

28 100. Deny.

1 101. Deny.

2 102. Deny.

3 103. The contents of the alleged text message speak for themselves, and to
4 the extent that the allegations in Paragraph 103 regarding the alleged text message
5 are inconsistent with that alleged text message, they are denied. Defendants deny
6 the remaining allegations in Paragraph 103 of the FAC.

7 104. The contents of the alleged text message speak for themselves, and to
8 the extent that the allegations in Paragraph 104 are inconsistent with that alleged
9 text message, they are denied.

10 105. Deny.

11 106. Deny.

12 107. Deny.

13 108. Deny.

14 109. The contents of the alleged text message speak for themselves, and to
15 the extent that the allegations in Paragraph 109 are inconsistent with that alleged
16 text message, they are denied.

17 110. The contents of the alleged text message speak for themselves, and to
18 the extent that the allegations in Paragraph 110 regarding the text message are
19 inconsistent with that alleged text message, they are denied. Defendants deny the
20 remaining allegations in Paragraph 110 of the FAC.

21 111. The contents of the alleged text messages speak for themselves, and to
22 the extent that the allegations in Paragraph 111 are inconsistent with those alleged
23 text messages, they are denied.

24 112. Deny.

25 113. The alleged Instagram post speaks for itself, and to the extent that the
26 allegations in Paragraph 113 are inconsistent with that alleged Instagram post, they
27 are denied.

28 114. Deny.

1 115. Defendants are without knowledge or information sufficient to form a
2 belief as to the truth of the allegations in the first three sentences of Paragraph 115
3 of the FAC, and therefore deny the same. Defendants deny the remaining
4 allegations in Paragraph 115 of the FAC.

5 116. Deny.

6 117. The contents of the alleged text message speak for themselves, and to
7 the extent that the allegations in Paragraph 117 are inconsistent with that alleged
8 text message, they are denied.

9 118. The contents of the alleged text message speak for themselves, and to
10 the extent that the allegations in Paragraph 118 are inconsistent with that alleged
11 text message, they are denied.

12 119. The contents of the alleged text message speak for themselves, and to
13 the extent that the allegations in Paragraph 119 regarding the alleged text message
14 are inconsistent with that alleged text message, they are denied. The contents of
15 the *Essence* Magazine article alleged in Paragraph 119 Footnote 10 speak for
16 themselves, and to the extent that the allegations in Paragraph 119 regarding the
17 alleged article are inconsistent with that alleged article, they are denied.

18 120. Deny.

19 121. The contents of the alleged text messages speak for themselves, and to
20 the extent that the allegations in Paragraph 121 are inconsistent with those alleged
21 text messages, they are denied.

22 122. The contents of the alleged text message speak for themselves, and to
23 the extent that the allegations in Paragraph 122 are inconsistent with that alleged
24 text message, they are denied. Defendants are without knowledge or information
25 sufficient to form a belief as to the truth of the remaining allegations in Paragraph
26 122 of the FAC, and therefore deny the same.

27 123. Deny.

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1 124. The contents of the alleged text message speak for themselves, and to
2 the extent that the allegations in Paragraph 124 are inconsistent with that alleged
3 text message, they are denied. Defendants deny the remaining allegations in
4 Paragraph 124 of the FAC.

5 125. The contents of the alleged text message speak for themselves, and to
6 the extent that the allegations in Paragraph 125 are inconsistent with that alleged
7 text message, they are denied.

8 126. Defendants are without knowledge or information sufficient to form a
9 belief as to the truth of the allegations in the first sentence of Paragraph 126 of the
10 FAC, and therefore deny the same. The police report alleged in Paragraph 126
11 Footnote 11 speak for themselves, and to the extent that the allegations in
12 Paragraph 126 regarding the alleged police report are inconsistent with that alleged
13 police report, they are denied. Defendants deny the remaining allegations in
14 Paragraph 126 of the FAC.

15 127. Deny.

16 128. Deny.

17 129. Defendants are without knowledge or information sufficient to form a
18 belief as to the truth of the allegations in Paragraph 129 of the FAC, and therefore
19 deny the same.

20 130. Defendants are without knowledge or information sufficient to form a
21 belief as to the truth of the allegations in Paragraph 130 of the FAC, and therefore
22 deny the same.

23 131. Deny.

24 132. Defendants are without knowledge or information sufficient to form a
25 belief as to the truth of the allegations in Paragraph 132 of the FAC, and therefore
26 deny the same.

27 133. Deny.

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1 134. Defendants are without knowledge or information sufficient to form a
2 belief as to the truth of the allegations in Paragraph 134 of the FAC, and therefore
3 deny the same.

4 135. Deny.

5 136. Defendants are without knowledge or information sufficient to form a
6 belief as to the truth of the allegations in the first sentence of Paragraph 136 of the
7 FAC, and therefore deny the same. Defendants deny the remaining allegations in
8 Paragraph 136 of the FAC.

9 137. Deny.

10 138. Defendants are without knowledge or information sufficient to form a
11 belief as to the truth of the allegations in the first two sentences of Paragraph 138
12 of the FAC, and therefore deny the same. Defendants deny the remaining
13 allegations in Paragraph 138 of the FAC.

14 139. Deny.

15 140. Defendants are without knowledge or information sufficient to form a
16 belief as to the truth of the allegations in Paragraph 140 of the FAC, and therefore
17 deny the same.

18 141. Deny.

19 142. Deny.

20 143. Deny.

21 144. Deny.

22 145. Defendants are without knowledge or information sufficient to form a
23 belief as to the truth of the allegations in Paragraph 145 of the FAC, and therefore
24 deny the same.

25 146. Defendants are without knowledge or information sufficient to form a
26 belief as to the truth of the allegations in Paragraph 146 of the FAC, and therefore
27 deny the same.

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1 147. Defendants are without knowledge or information sufficient to form a
2 belief as to the truth of the allegations in Paragraph 147 of the FAC, and therefore
3 deny the same.

4 148. Deny.

5 149. The contents of the alleged email speak for themselves, and to the
6 extent that the allegations in Paragraph 149 are inconsistent with that alleged
7 email, they are denied. Defendants deny the remaining allegations in Paragraph
8 149 of the FAC.

9 150. Deny.

10 151. Defendants are without knowledge or information sufficient to form a
11 belief as to the truth of the allegations in Paragraph 151 of the FAC, and therefore
12 deny the same.

13 152. Deny.

14 153. Deny.

15 154. The contents of the alleged text message speak for themselves, and to
16 the extent that the allegations in Paragraph 154 regarding the alleged text message
17 are inconsistent with that alleged text message, they are denied. Defendants deny
18 the remaining allegations in Paragraph 154 of the FAC.

19 155. The contents of the alleged text message speak for themselves, and to
20 the extent that the allegations in Paragraph 155 are inconsistent with that alleged
21 text message, they are denied. Defendants are without knowledge or information
22 sufficient to form a belief as to the truth of the remaining allegations in Paragraph
23 155 of the FAC, and therefore deny the same.

24 156. The contents of the alleged text message speak for themselves, and to
25 the extent that the allegations in Paragraph 156 are inconsistent with that alleged
26 text message, they are denied.

27 157. The contents of the alleged text message speak for themselves, and to
28 the extent that the allegations in Paragraph 157 regarding the alleged text message

1 are inconsistent with that alleged text message, they are denied. Defendants deny
2 the remaining allegations in Paragraph 157 of the FAC.

3 158. The contents of the alleged text messages speak for themselves, and to
4 the extent that the allegations in Paragraph 158 regarding the alleged text messages
5 are inconsistent with those alleged text messages, they are denied. Defendants are
6 without knowledge or information sufficient to form a belief as to the truth of the
7 remaining allegations in Paragraph 158 of the FAC, and therefore deny the same.

8 159. Defendants are without knowledge or information sufficient to form a
9 belief as to the truth of the allegations in Paragraph 159 of the FAC, and therefore
10 deny the same.

11 160. Defendants are without knowledge or information sufficient to form a
12 belief as to the truth of the allegations in Paragraph 160 of the FAC, and therefore
13 deny the same.

14 161. Deny.

15 162. Deny.

16 163. Deny.

17 164. Deny.

18 165. Deny.

19 166. Defendants are without knowledge or information sufficient to form a
20 belief as to the truth of the allegations in Paragraph 166 of the FAC, and therefore
21 deny the same.

22 167. Defendants are without knowledge or information sufficient to form a
23 belief as to the truth of the allegations in Paragraph 167 of the FAC, and therefore
24 deny the same.

25 168. Defendants deny The-Dream's control and abuse. Defendants are
26 without knowledge or information sufficient to form a belief as to the truth of the
27 remaining allegations in Paragraph 168 of the FAC, and therefore deny the same.

28 169. Deny.

1 170. Deny.

2 171. Deny.

3 172. Deny.

4 173. Deny.

5 174. Defendants are without knowledge or information sufficient to form a
6 belief as to the truth of the allegations in the first sentence of Paragraph 174 of the
7 FAC, and therefore deny the same. Defendants deny the remaining allegations in
8 Paragraph 174 of the FAC.

9 175. The contents of the alleged text messages speak for themselves, and to
10 the extent that the allegations in Paragraph 175 are inconsistent with those alleged
11 text messages, they are denied. Defendants deny the remaining allegations in
12 Paragraph 175 of the FAC.

13 176. Defendants are without knowledge or information sufficient to form a
14 belief as to the truth of the allegations in Paragraph 176 of the FAC, and therefore
15 deny the same.

16 177. Deny.

17 178. Defendants are without knowledge or information sufficient to form a
18 belief as to the truth of the allegations in Paragraph 178 of the FAC, and therefore
19 deny the same.

20 179. Deny.

21 180. The contents of the alleged text message speak for themselves, and to
22 the extent that the allegations in Paragraph 180 regarding the alleged text message
23 are inconsistent with that alleged text message, they are denied. Defendants are
24 without knowledge or information sufficient to form a belief as to the truth of the
25 remaining allegations in Paragraph 180 of the FAC, and therefore deny the same.

26 181. The contents of the alleged contract speak for themselves, and to the
27 extent that the allegations in Paragraph 181 are inconsistent with that alleged
28 contract, they are denied.

1 182. The contents of the alleged contract speak for themselves, and to the
2 extent that the allegations in Paragraph 182 are inconsistent with that alleged
3 contract, they are denied.

4 183. The contents of the alleged contract speak for themselves, and to the
5 extent that the allegations in Paragraph 183 are inconsistent with that alleged
6 contract, they are denied.

7 184. The contents of the alleged contract speak for themselves, and to the
8 extent that the allegations in Paragraph 184 regarding the alleged contract are
9 inconsistent with that alleged contract, they are denied. The contents of the alleged
10 text message speak for themselves, and to the extent that the allegations in
11 Paragraph 184 regarding the alleged text message are inconsistent with that alleged
12 text message, they are denied.

13 185. The contents of the alleged contract speak for themselves, and to the
14 extent that the allegations in Paragraph 185 are inconsistent with that alleged
15 contract, they are denied. Defendants deny the remaining allegations in Paragraph
16 185 of the FAC.

17 186. Deny.

18 187. Defendants are without knowledge or information sufficient to form a
19 belief as to the truth of the allegations in Paragraph 187 of the FAC, and therefore
20 deny the same.

21 188. The contents of the alleged contract speak for themselves, and to the
22 extent that the allegations in Paragraph 188 are inconsistent with that alleged
23 contract, they are denied. Defendants deny the remaining allegations in Paragraph
24 188 of the FAC.

25 189. Defendants are without knowledge or information sufficient to form a
26 belief as to the truth of the allegations in the first sentence of Paragraph 189 of the
27 FAC, and therefore deny the same. The contents of the alleged text message speak
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1 for themselves, and to the extent that the allegations in Paragraph 189 are
2 inconsistent with that alleged text message, they are denied.

3 190. Defendants are without knowledge or information sufficient to form a
4 belief as to the truth of the allegations in Paragraph 190 of the FAC, and therefore
5 deny the same.

6 191. Deny.

7 192. Deny.

8 193. Deny.

9 194. Deny.

10 195. Defendants are without knowledge or information sufficient to form a
11 belief as to the truth of the allegations in the first sentence of Paragraph 195 of the
12 FAC, and therefore deny the same. The contents of the alleged text messages
13 speak for themselves, and to the extent that the allegations in Paragraph 195
14 regarding the alleged text messages are inconsistent with those alleged text
15 messages, they are denied. Defendants deny the remaining allegations in
16 Paragraph 195 of the FAC.

17 196. Defendants are without knowledge or information sufficient to form a
18 belief as to the truth of the allegations in Paragraph 196 of the FAC, and therefore
19 deny the same.

20 197. Defendants are without knowledge or information sufficient to form a
21 belief as to the truth of the allegations in Paragraph 197 of the FAC, and therefore
22 deny the same.

23 198. Deny.

24 199. Defendants are without knowledge or information sufficient to form a
25 belief as to the truth of the allegations in Paragraph 199 of the FAC, and therefore
26 deny the same.

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1 200. Defendants are without knowledge or information sufficient to form a
2 belief as to the truth of the allegations in Paragraph 200 of the FAC, and therefore
3 deny the same.

4 201. Deny.

5 202. Defendants are without knowledge or information sufficient to form a
6 belief as to the truth of the allegations in Paragraph 202 of the FAC, and therefore
7 deny the same.

8 203. The contents of the alleged text message speak for themselves, and to
9 the extent that the allegations in Paragraph 203 regarding the alleged text message
10 are inconsistent with that alleged text message, they are denied.

11 204. The contents of the alleged text messages speak for themselves, and to
12 the extent that the allegations in Paragraph 204 regarding the alleged text messages
13 are inconsistent with those alleged text messages, they are denied. Defendants are
14 without knowledge or information sufficient to form a belief as to the truth of the
15 remaining allegations in Paragraph 204 of the FAC, and therefore deny the same.

16 205. Deny.

17 206. Defendants are without knowledge or information sufficient to form a
18 belief as to the truth of the allegations in the first two sentences of Paragraph 206
19 of the FAC, and therefore deny the same. Defendants deny the remaining
20 allegations in Paragraph 206 of the FAC.

21 207. The contents of the alleged text messages speak for themselves, and to
22 the extent that the allegations in Paragraph 207 are inconsistent with those alleged
23 text messages, they are denied.

24 208. The contents of the alleged text messages speak for themselves, and to
25 the extent that the allegations in Paragraph 208 are inconsistent with those alleged
26 text messages, they are denied.

27 209. Deny.

28 210. Deny.

1 211. Defendants are without knowledge or information sufficient to form a
2 belief as to the truth of the allegations in Paragraph 211 of the FAC, and therefore
3 deny the same.

4 212. Defendants are without knowledge or information sufficient to form a
5 belief as to the truth of the allegations in Paragraph 212 of the FAC, and therefore
6 deny the same.

7 213. Defendants are without knowledge or information sufficient to form a
8 belief as to the truth of the allegations in Paragraph 213 of the FAC, and therefore
9 deny the same.

10 214. Defendants are without knowledge or information sufficient to form a
11 belief as to the truth of the allegations in Paragraph 214 of the FAC, and therefore
12 deny the same.

13 215. Deny.

14 216. Deny.

15 217. Deny.

16 218. Defendants are without knowledge or information sufficient to form a
17 belief as to the truth of the allegations in Paragraph 218 of the FAC, and therefore
18 deny the same.

19 219. Deny.

20 220. Deny.

21 221. Deny.

22 222. Deny.

23 223. Deny.

24 224. Deny.

25 225. Defendants are without knowledge or information sufficient to form a
26 belief as to the truth of the allegations in Paragraph 225 of the FAC, and therefore
27 deny the same.

28 226. Deny.

1 227. Deny.

2 228. Defendants are without knowledge or information sufficient to form a
3 belief as to the truth of the allegations in Paragraph 228 of the FAC, and therefore
4 deny the same.

5 229. Deny.

6 230. Defendants are without knowledge or information sufficient to form a
7 belief as to the truth of the allegations in Paragraph 230 of the FAC, and therefore
8 deny the same.

9 231. Deny.

10 232. Deny.

11 233. Defendants are without knowledge or information sufficient to form a
12 belief as to the truth of the allegations in the second sentence of Paragraph 233 of
13 the FAC, and therefore deny the same. Defendants deny the remaining allegations
14 in Paragraph 233 of the FAC.

15 234. Defendants are without knowledge or information sufficient to form a
16 belief as to the truth of the allegations in the first sentence of Paragraph 234 of the
17 FAC, and therefore deny the same. Defendants deny the remaining allegations in
18 Paragraph 234 of the FAC.

19 235. Deny.

20 236. Defendants are without knowledge or information sufficient to form a
21 belief as to the truth of the allegations in the second and third sentences of
22 Paragraph 236 of the FAC, and therefore deny the same. Defendants deny the
23 remaining allegations in Paragraph 236 of the FAC.

24 237. The contents of the alleged text messages speak for themselves, and to
25 the extent that the allegations in Paragraph 237 regarding the alleged text messages
26 are inconsistent with those alleged text messages, they are denied. Defendants are
27 without knowledge or information sufficient to form a belief as to the truth of the
28 remaining allegations in Paragraph 237 of the FAC, and therefore deny the same.

1 238. The contents of the alleged text messages speak for themselves, and to
2 the extent that the allegations in Paragraph 238 are inconsistent with those alleged
3 text messages, they are denied.

4 239. Defendants are without knowledge or information sufficient to form a
5 belief as to the truth of the allegations in Paragraph 239 of the FAC, and therefore
6 deny the same.

7 240. Defendants are without knowledge or information sufficient to form a
8 belief as to the truth of the allegations in the first sentence of Paragraph 240 of the
9 FAC, and therefore deny the same. Defendants deny the remaining allegations in
10 Paragraph 240 of the FAC.

11 241. Defendants are without knowledge or information sufficient to form a
12 belief as to the truth of the allegations in the first and second sentences of
13 Paragraph 241 of the FAC, and therefore deny the same. Defendants deny the
14 remaining allegations in Paragraph 241 of the FAC.

15 242. Defendants are without knowledge or information sufficient to form a
16 belief as to the truth of the allegations in Paragraph 242 of the FAC, and therefore
17 deny the same.

18 243. Defendants are without knowledge or information sufficient to form a
19 belief as to the truth of the allegations in the first sentence of Paragraph 243 of the
20 FAC, and therefore deny the same. Defendants deny the remaining allegations in
21 Paragraph 243 of the FAC.

22 244. Defendants are without knowledge or information sufficient to form a
23 belief as to the truth of the allegations in Paragraph 244 of the FAC, and therefore
24 deny the same.

25 245. Defendants are without knowledge or information sufficient to form a
26 belief as to the truth of the allegations in Paragraph 245 of the FAC, and therefore
27 deny the same.

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1 246. Defendants are without knowledge or information sufficient to form a
2 belief as to the truth of the allegations in Paragraph 246 of the FAC, and therefore
3 deny the same.

4 247. Defendants are without knowledge or information sufficient to form a
5 belief as to the truth of the allegations in Paragraph 247 of the FAC, and therefore
6 deny the same.

7 248. Defendants are without knowledge or information sufficient to form a
8 belief as to the truth of the allegations in Paragraph 248 of the FAC, and therefore
9 deny the same.

10 249. Defendants are without knowledge or information sufficient to form a
11 belief as to the truth of the allegations in the first and third sentences of Paragraph
12 249 of the FAC, and therefore deny the same. Defendants deny the remaining
13 allegations in Paragraph 249 of the FAC.

14 250. Defendants are without knowledge or information sufficient to form a
15 belief as to the truth of the allegations in Paragraph 250 of the FAC, and therefore
16 deny the same.

17 251. The contents of the alleged text message speak for themselves, and to
18 the extent that the allegations in Paragraph 251 are inconsistent with that alleged
19 text message, they are denied.

20 252. Defendants are without knowledge or information sufficient to form a
21 belief as to the truth of the allegations in Paragraph 252 of the FAC, and therefore
22 deny the same.

23 253. Defendants are without knowledge or information sufficient to form a
24 belief as to the truth of the allegations in Paragraph 253 of the FAC, and therefore
25 deny the same.

26 254. Defendants are without knowledge or information sufficient to form a
27 belief as to the truth of the allegations in Paragraph 254 of the FAC, and therefore
28 deny the same.

1 255. Defendants are without knowledge or information sufficient to form a
2 belief as to the truth of the allegations in Paragraph 255 of the FAC, and therefore
3 deny the same.

4 256. Defendants are without knowledge or information sufficient to form a
5 belief as to the truth of the allegations in Paragraph 256 of the FAC, and therefore
6 deny the same.

7 257. Defendants are without knowledge or information sufficient to form a
8 belief as to the truth of the allegations in Paragraph 257 of the FAC, and therefore
9 deny the same.

10 258. Defendants are without knowledge or information sufficient to form a
11 belief as to the truth of the allegations in Paragraph 258 of the FAC, and therefore
12 deny the same.

13 259. Defendants are without knowledge or information sufficient to form a
14 belief as to the truth of the allegations in Paragraph 259 of the FAC, and therefore
15 deny the same.

16 260. Defendants are without knowledge or information sufficient to form a
17 belief as to the truth of the allegations in Paragraph 260 of the FAC, and therefore
18 deny the same.

19 261. Deny.

20 262. Defendants are without knowledge or information sufficient to form a
21 belief as to the truth of the allegations in Paragraph 262 of the FAC, and therefore
22 deny the same.

23 263. Defendants are without knowledge or information sufficient to form a
24 belief as to the truth of the allegations in Paragraph 263 of the FAC, and therefore
25 deny the same.

26 264. Defendants are without knowledge or information sufficient to form a
27 belief as to the truth of the allegations in Paragraph 264 of the FAC, and therefore
28 deny the same.

1 265. Defendants are without knowledge or information sufficient to form a
2 belief as to the truth of the allegations in Paragraph 265 of the FAC, and therefore
3 deny the same.

4 266. Defendants are without knowledge or information sufficient to form a
5 belief as to the truth of the allegations in Paragraph 266 of the FAC, and therefore
6 deny the same.

7 267. Defendants are without knowledge or information sufficient to form a
8 belief as to the truth of the allegations in Paragraph 267 of the FAC, and therefore
9 deny the same.

10 268. Defendants are without knowledge or information sufficient to form a
11 belief as to the truth of the allegations in Paragraph 268 of the FAC, and therefore
12 deny the same.

13 269. Defendants are without knowledge or information sufficient to form a
14 belief as to the truth of the allegations in Paragraph 269 of the FAC, and therefore
15 deny the same.

16 270. Deny.

17 271. Defendants are without knowledge or information sufficient to form a
18 belief as to the truth of the allegations in Paragraph 271 of the FAC, and therefore
19 deny the same.

20 272. Defendants are without knowledge or information sufficient to form a
21 belief as to the truth of the allegations in Paragraph 272 of the FAC, and therefore
22 deny the same.

23 273. Defendants are without knowledge or information sufficient to form a
24 belief as to the truth of the allegations in Paragraph 273 of the FAC, and therefore
25 deny the same.

26 274. Defendants are without knowledge or information sufficient to form a
27 belief as to the truth of the allegations in Paragraph 274 of the FAC, and therefore
28 deny the same.

1 275. Defendants are without knowledge or information sufficient to form a
2 belief as to the truth of the allegations in Paragraph 275 of the FAC, and therefore
3 deny the same.

4 276. Defendants are without knowledge or information sufficient to form a
5 belief as to the truth of the allegations in Paragraph 276 of the FAC, and therefore
6 deny the same.

7 277. Defendants are without knowledge or information sufficient to form a
8 belief as to the truth of the allegations in Paragraph 277 of the FAC, and therefore
9 deny the same.

10 278. Defendants are without knowledge or information sufficient to form a
11 belief as to the truth of the allegations in Paragraph 278 of the FAC, and therefore
12 deny the same.

13 279. Defendants are without knowledge or information sufficient to form a
14 belief as to the truth of the allegations in Paragraph 279 of the FAC, and therefore
15 deny the same.

16 280. Defendants are without knowledge or information sufficient to form a
17 belief as to the truth of the allegations in Paragraph 280 of the FAC, and therefore
18 deny the same.

19 281. Defendants are without knowledge or information sufficient to form a
20 belief as to the truth of the allegations in Paragraph 281 of the FAC, and therefore
21 deny the same.

22 282. Defendants are without knowledge or information sufficient to form a
23 belief as to the truth of the allegations in Paragraph 282 of the FAC, and therefore
24 deny the same.

25 283. Defendants are without knowledge or information sufficient to form a
26 belief as to the truth of the allegations in Paragraph 283 of the FAC, and therefore
27 deny the same.

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1 284. Defendants are without knowledge or information sufficient to form a
2 belief as to the truth of the allegations in Paragraph 284 of the FAC, and therefore
3 deny the same.

4 285. Defendants are without knowledge or information sufficient to form a
5 belief as to the truth of the allegations in Paragraph 285 of the FAC, and therefore
6 deny the same.

7 286. Defendants are without knowledge or information sufficient to form a
8 belief as to the truth of the allegations in Paragraph 286 of the FAC, and therefore
9 deny the same.

10 287. Defendants are without knowledge or information sufficient to form a
11 belief as to the truth of the allegations in Paragraph 287 of the FAC, and therefore
12 deny the same.

13 288. Defendants deny the fourth sentence of Paragraph 288 of the FAC.
14 Defendants are without knowledge or information sufficient to form a belief as to
15 the truth of the remaining allegations in Paragraph 288 of the FAC, and therefore
16 deny the same.

17 289. Defendants are without knowledge or information sufficient to form a
18 belief as to the truth of the allegations in Paragraph 289 of the FAC, and therefore
19 deny the same.

20 290. Deny.

21 291. Deny.

22 292. Defendants are without knowledge or information sufficient to form a
23 belief as to the truth of the allegations in Paragraph 292 of the FAC, and therefore
24 deny the same.

25 293. Deny.

26 294. Deny.

27 295. Deny.

28 ///

296. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 296 of the FAC, and therefore deny the same.

297. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 297 of the FAC, and therefore deny the same.

298. Deny.

299. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in the first sentence of Paragraph 299 of the FAC, and therefore deny the same. Defendants deny the remaining allegations in Paragraph 299 of the FAC.

300. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in the first and third sentences of Paragraph 300 of the FAC, and therefore deny the same. Defendants deny the remaining allegations in Paragraph 300 of the FAC.

FIRST CLAIM FOR RELIEF

(Sex Trafficking Under 18 U.S.C. § 1595)

301. Defendants repeat their responses and denials to the preceding and foregoing paragraphs as if fully set forth herein.

302. Paragraph 302 of the FAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 302 of the FAC.

303. Paragraph 303 of the FAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 303 of the FAC.

304. Paragraph 304 of the FAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 304 of the FAC.

1 305. Paragraph 305 of the FAC states legal conclusions, to which no
2 response is required. To the extent that a response is required, Defendants deny
3 the allegations in Paragraph 305 of the FAC.

4 306. Paragraph 306 of the FAC states legal conclusions, to which no
5 response is required. To the extent that a response is required, Defendants deny
6 the allegations in Paragraph 306 of the FAC.

7 307. Paragraph 307 of the FAC states legal conclusions, to which no
8 response is required. To the extent that a response is required, Defendants deny
9 the allegations in Paragraph 307 of the FAC.

10 308. Paragraph 308 of the FAC states legal conclusions, to which no
11 response is required. To the extent that a response is required, Defendants deny
12 the allegations in Paragraph 308 of the FAC.

13 309. Paragraph 309 of the FAC states legal conclusions, to which no
14 response is required. To the extent that a response is required, Defendants deny
15 the allegations in Paragraph 309 of the FAC.

16 310. Paragraph 310 of the FAC states legal conclusions, to which no
17 response is required. To the extent that a response is required, Defendants deny
18 the allegations in Paragraph 310 of the FAC.

19 311. Paragraph 311 of the FAC states legal conclusions, to which no
20 response is required. To the extent that a response is required, Defendants deny
21 the allegations in Paragraph 311 of the FAC.

22 312. Paragraph 312 of the FAC states legal conclusions, to which no
23 response is required. To the extent that a response is required, Defendants deny
24 the allegations in Paragraph 312 of the FAC.

25 313. Paragraph 313 of the FAC states legal conclusions, to which no
26 response is required. To the extent that a response is required, Defendants deny
27 the allegations in Paragraph 313 of the FAC.

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SECOND CLAIM FOR RELIEF

(Civil Sexual Assault)

314. Defendants repeat their responses and denials to the preceding and foregoing paragraphs as if fully set forth herein.

315. Paragraph 315 of the FAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 315 of the FAC.

316. Paragraph 316 of the FAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 316 of the FAC.

317. Paragraph 317 of the FAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 317 of the FAC.

318. Paragraph 318 of the FAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 318 of the FAC.

319. Paragraph 319 of the FAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 319 of the FAC.

PRAYER FOR RELIEF

The prayer for relief does not require a response. To the extent a response is required, Defendants deny that Plaintiff is entitled to any relief whatsoever from Defendants or this Court, either as requested in the FAC or otherwise.

AFFIRMATIVE DEFENSES

Defendants assert the following affirmative defenses without conceding that they bear the burden of proof as to any of the defenses pled. Defendants reserve the right to amend or supplement these defenses and to take further positions as discovery proceeds in this case.

FIRST AFFIRMATIVE DEFENSE

(Failure To State A Claim)

The FAC and each claim for relief alleged therein are barred, in whole or in part, because they fail to state any claim upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

(Laches)

The FAC and each claim for relief alleged therein are barred, in whole or in part, by the doctrine of laches.

THIRD AFFIRMATIVE DEFENSE

(Waiver, Estoppel, Acquiescence, Consent)

The FAC and each claim for relief alleged therein are barred, in whole or in part, by the doctrines of waiver, estoppel, acquiescence, and/or consent.

FOURTH AFFIRMATIVE DEFENSE

(Unclean Hands)

The FAC and each claim for relief alleged therein are barred, in whole or in part, by the doctrine of unclean hands.

FIFTH AFFIRMATIVE DEFENSE

(No Damages)

The FAC and each claim for relief alleged therein are barred, in whole or in part, because there have been no damages in any amount, manner, or at all by reason of any act alleged against Defendants in the FAC.

SIXTH AFFIRMATIVE DEFENSE

(Failure to Mitigate Damages)

If Plaintiff has suffered any damages or injury in fact, which Defendants expressly deny, Defendants allege that Plaintiff's recovery is barred by her failure to mitigate, reduce, or otherwise avoid damages or injuries.

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SEVENTH AFFIRMATIVE DEFENSE

(Statute of Limitations)

The FAC and each claim for relief alleged therein are barred, in whole or in part, by the applicable statute of limitations.

EIGHTH AFFIRMATIVE DEFENSE

(Mistake Of Fact As To Consent)

The FAC and each claim for relief alleged therein are barred, in whole or in part, by mistake of fact as to consent.

NINTH AFFIRMATIVE DEFENSE

(Lack of Knowledge)

The FAC and each claim for relief alleged therein are barred, in whole or in part, by lack of knowledge of the acts complained of in the FAC.

TENTH AFFIRMATIVE DEFENSE

Defendants assert that they may have other separate and additional defenses of which they are presently unaware and hereby reserve the right to assert these additional defenses as discovery warrants.

JURY DEMAND

Defendants hereby request a trial by jury pursuant to Rule 38 of the Federal Rules of Civil Procedure.

Dated: October 4, 2024

VENABLE LLP

By: /s/ Desirée F. Moore

Desirée F. Moore
Joshua M. Rosenberg
Rachel C. Richards
Kaidyn P. McClure

*Attorneys for Defendants
Terius Gesteelde-Diamant and Contra
Paris, LLC*